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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC., AMERICAN
TECHNOLOGY SERVICES, COMPLIANCE
CONSULTANTS, CHROME BUILDERS
CONSTRUCTION, INC., and UNIFIED
DATA SERVICES,

Plaintiffs,

v.
BANK OF AMERICA, N.A., and JOHN and
JANE DOES 1, 100

Defendants.

Case No.: 2:18-cv-01919-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND RESPONSE DEADLINE FOR
PLAINTIFFS' SECOND MOTION TO
COMPEL DISCOVERY AND FOR
SANCTIONS TO JUNE 4, 2021**

(FIRST REQUEST)

Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs Richard Zeitlin; Advanced Telephony Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American Technology Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified Data Services (the “Plaintiffs”) and Defendant Bank of America, N.A. (“BANA”), by and through their respective undersigned counsel of record, submit this Stipulation and Proposed Order for a 16-day extension of BANA’s deadline to file its response to Plaintiffs’ Second Motion to Compel Discovery and For Sanctions (ECF No. 104) (the “Motion”) from May 19, 2021, BANA’s current

1 deadline to respond pursuant to Local Rule 7-2(b), to June 4, 2021. Plaintiffs' Motion was filed,
 2 along with a Motion to Seal, on May 5, 2021. [ECF Nos. 102, 104.]

3 This is the Parties' first request for an extension of BANA's time to file its response to the
 4 Motion and is not intended to cause any delay or prejudice to any party. The reason for the
 5 extension is to give BANA time to evaluate and respond to the arguments set forth in the Motion.

6 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time
 7 for BANA to file its response to the Motion is extended to and through June 4, 2021.

8 **IT IS SO STIPULATED.**

9 Dated: May 6, 2021

Dated: May 6, 2021

10 THE BERNHOFT LAW FIRM, S.C.

11 SNELL & WILMER L.L.P.

12 /s/ Daniel James Treuden

13 Robert G. Bernhoft, Esq.
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12 /s/ Holly E. Cheong

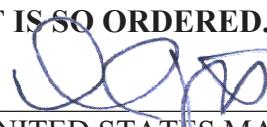
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15 *Attorneys for Defendant Bank of America,
 N.A.*

16 *Attorneys for Plaintiffs*

17 **IT IS SO ORDERED.**

18 
 UNITED STATES MAGISTRATE JUDGE

19 DATED: May 7, 2021

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this date, I electronically filed the foregoing **STIPULATION**
3 **AND ORDER TO EXTEND RESPONSE DEADLINE FOR PLAINTIFFS' SECOND**
4 **MOTION TO COMPEL DISCOVERY AND FOR SANCTIONS TO JUNE 4, 2021 (FIRST**
5 **REQUEST)** with the Clerk of the Court for the U. S. District Court, District of Nevada by using
6 the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be
7 served by the CM/ECF system.

8 DATED: May 6, 2021

9 */s/Gaylene Kim-Mistrille*

10 An Employee of Snell & Wilmer L.L.P.

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